## Exhibit 12

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IN THE UNITED STATES DISTRICT COURT
   FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
DEMOCRACY NORTH CAROLINA;
NORTH CAROLINA BLACK ALLIANCE;
LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA,
          Plaintiffs,
vs.
                                  ) Civil Action No.
                                  )1:23CV00878-TDS-JEP
ALAN HIRSCH, in his official
capacity as CHAIR OF THE STATE
BOARD OF ELECTIONS; JEFF
CAMERON III, in his official
capacity as SECRETARY OF THE
STATE BOARD OF ELECTIONS;
STACY EGGERS IV, in his
official capacity as MEMBER
OF THE STATE BOARD OF
ELECTIONS; KEVIN LEWIS, in his
official capacity as MEMBER OF
THE STATE BOARD OF ELECTIONS;
SIOBHAN O'DUFFY MILLEN, in her
official capacity as MEMBER OF
THE STATE BOARD OF ELECTIONS;
KAREN BRINSON BELL, in her
official capacity as EXECUTIVE
DIRECTOR OF THE STATE BOARD OF
ELECTIONS; NORTH CAROLINA
STATE BOARD OF ELECTIONS,
          Defendants.
      VIDEOTAPED DEPOSITION OF CLETA MITCHELL
                (Taken by Plaintiffs)
                Raleigh, North Carolina
           Wednesday, September 25th, 2024
        Certified Stenographic Court Reporter
            Amy A. Brauser, RPR, RMR, CRR
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1

1	A. Well, I know that there is an
2	allegation that somehow I was involved with it as a
3	means of stopping college students from voting.
4	That's alleged. It's not true, but I know that's
5	what's alleged.
6	Q. Anything else that you know about this?
7	A. Well, it's just sort of the same litany
8	of arguments that are always leveled at any effort
9	to strengthen the integrity of elections.
10	Q. Now, you've told us that the when
11	we're talking about the integrity of elections,
12	that's a very broad scope.
13	A. It is a very broad term.
14	Q. Is this a very broad Complaint?
15	A. No, it's very it's targeted to one
16	topic.
17	Q. And what topic is that?
18	A. Same-day registration.
19	Q. So when you were saying that it
20	contains a litany of the same things that are
21	A. Well, it's
22	Q always there let me finish my
23	question, please.
24	When you say that it has a litany of
25	the same Complaints about all election integrity,

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1
           Α.
                 Okay.
                 I'm going to read it. (Reading)
2
          0.
3
                    Same-day registration, paren,
           SDR, close paren, during early voting
4
5
           is inadequately scrutinized -
6
           electronic and unverified address
7
           documentation allowed.
8
                 Do you see that?
                 I see that.
          Α.
10
                 Do you remember a discussion at this
          Q.
11
    roundtable of that issue?
12
                 I do not.
          A .
13
                 The second-to-the-last bullet says:
          0.
14
    (Reading)
15
                    Out-of-state college student
16
           registration to vote in North Carolina
17
           remains problematic.
18
                 Do you see that?
19
          Α.
                 I see that.
20
                 Do you recall a discussion about that
          Q.
21
    at this meeting?
22
          Α.
                 No.
23
           Q.
                 And then the last is: (Reading)
24
                    UOCAVA has created nonresident
25
            registration fraud in some
                                                      229
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